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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DISTRICT

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) No. S1-4:20-CR-00418-JAR
JAMES TIMOTHY NORMAN,)
Defendant.)

GOVERNMENT'S RESPONSE IN OPPOSITION TO DEFENDANT NORMAN'S MOTION TO DISMISS (DOC. #321)

COMES NOW the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Angie E. Danis and Gwendolyn E. Carroll, Assistant United States Attorneys for said district, and submits this Response in Opposition to Defendant James Timothy Norman's Motion to Dismiss (Doc. #321). In support, the United States provides the following:

- 1. The Government hereby incorporates by reference all facts and supporting law articulated in its previously filed Response to a prior Motion to Dismiss (Doc. #309).
- 2. Counsel for Defendant Norman cites no legal authority in support of any claim or request for relief in its Motion to Dismiss, *etc*.
- 3. As set forth in the Superseding Indictment (Doc. #80), co-defendant Travell Hill's involvement in the conspiracy to commit murder-for-hire effectively ended on March 16, 2016, when he accepted a \$5,000 cash payment from Defendant Norman (through a third party) for the commission of said murder. The disclosure of Hill's 2020 arrest, during which he was found in possession of approximately five grams of ecstasy,

cannot realistically be said to prejudice Defendant Norman.

WHEREFORE, based on the foregoing, the Government respectfully asks this Court **DENY** Defendant Norman's Motion to Dismiss, *etc.* (Doc. #321) in its entirety.

Respectfully submitted, SAYLER A. FLEMING United States Attorney

/s/ Angie E. Danis

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CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ Angie E. Danis

ANGIE E. DANIS, #64805MO GWENDOLYN E. CARROLL, #4657003NY Assistant United States Attorneys